

JACKSON LEWIS LLP  
220 Headquarters Plaza  
East Tower, 7th Floor  
Morristown, New Jersey 07960  
(973) 538-6890

ATTORNEYS FOR DEFENDANT ENGLEWOOD HOSPITAL & MEDICAL CENTER

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

NEUROSURGICAL SPINE  
SPECIALISTS OF NJ a/s/o A.S.,

Plaintiff,

V.

QUALCARE INC.; ENGLEWOOD HOSPITAL; ABC CORP. (1-10) (Said names being fictitious and unknown entities),

## Defendants.

Civil Action No. 2:12-cv-5210 (CCC) (JAD)

**NOTICE OF MOTION TO DISMISS  
COUNTS SECOND, FOURTH, FIFTH,  
SIXTH & SEVENTH OF PLAINTIFF'S  
COMPLAINT**

TO: Andrew R. Bronsnick, Esq.  
Massood & Bronsnick, LLC  
50 Packanack Lake Road East  
Wayne, NJ 07470

**PLEASE TAKE NOTICE** that on Monday, June 3, 2013, or as soon thereafter as counsel may be heard, Defendant Englewood Hospital and Medical Center (“Defendant”), by and through its counsel, Jackson Lewis LLP, will move before this Court pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for an Order dismissing Counts Second, Fourth, Fifth, Sixth and Seventh of the Complaint of Plaintiff Neurosurgical Spine Specialists of NJ a/s/o A.S., as a matter of law.

**PLEASE TAKE FURTHER NOTICE** that in support of said motion, Defendant will rely upon the attached Memorandum of Law and supporting Declaration of Carla D. Macaluso.

Respectfully submitted,

JACKSON LEWIS LLP  
220 Headquarters Plaza  
East Tower, 7th Floor  
Morristown, New Jersey 07960

By: s/Carla D. Macaluso  
Carla D. Macaluso

Dated: April 29, 2013

4841-8592-2067, v. 1